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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA

DELPHINE ALLEN, et al.,)	MASTER FILE: No. C-00-4599-TEH
)	
Plaintiffs,)	[PROPOSED] ORDER EXTENDING TIME
)	FOR COMPLETING MEET AND CONFER
vs.)	PROCESS RE: OAKLAND POLICE
)	DEPARTMENT DISCIPLINE MATRIX.
CITY OF OAKLAND, et al.,)	
)	
Defendants.)	
)	
)	
)	

In the Court's Order "Extending Settlement Agreement" dated March 19, 2007 the parties were ordered to meet and confer on all issues related to the discipline matrix ("matrix") and to either resolve all issues or request referral to Magistrate Judge Larson for settlement conference by March 30, 2007. The parties have continued to meet and confer but will not be able to complete the meet and confer process by March 30, 2007 for the reasons set forth below. The City believes that it's in the best interests of all parties that the Court extend the time to complete the meet and confer process

1 on the Discipline Matrix for approximately 30 days. Good cause for the continuance is set forth
2 below. Plaintiffs' attorney James Chanin and Ms. Evans of the IMT have informed the undersigned
3 that they do not oppose the City's request for an extension of time. Counsel for the OPOA, Mr.
4 Lucia, has also been informed of this request and does not oppose it.

5 In the alternative, if the Court decides not to extend the March 30, 2007 deadline, then the
6 City respectfully requests that Court refer the discipline matrix issue to Magistrate Judge Larson for
7 a settlement conference to be scheduled after May 1, 2007, which will allow the parties time to
8 complete the meet and confer process over the next 30 days and be in a position to timely meet with
9 Judge Larson in the event there are any remaining issues that have not been finally resolved by the
10 meet and confer process.

11 Good cause for this request is set forth as follows. After preliminary discussions with Ms.
12 Evans of the IMT and the Plaintiffs' counsel, OPD decided to revert back to revising the current
13 discipline matrix instead of using a completely new format based on a model used by the California
14 Department of Corrections. OPD has revised penalties for the current matrix. OPD has revised the
15 Manual of Rules (MOR) based on attorney-client consultations with the City Attorney. OPD has
16 compared the matrix and MOR to ensure that all MORs are included in the revised Matrix. Chief
17 Tucker was away from the office most of the last two weeks attending a training conference and OPD
18 was unable to brief the Chief on this work.

19 Commencing the week of March 26th Chief Tucker will be briefed on the revised matrix and
20 MOR to ensure that his guidelines and direction are reflected in the matrix and that he approves the
21 revised matrix and MOR. Assuming the Chief's approval, the revised matrix and MOR will then be
22 distributed to the City's retained expert Pete France, the IMT, the Plaintiffs' attorneys, and the
23 OPOA, as well as the Office of the City Attorney for review and consultation.

24 OPD proposes the following schedule commencing the week of April 2, 2007. The week of
25 April 2, 2007, OPD allow the parties 5 days to review and respond to the revised draft matrix and
26 MOR. Commencing the week of April 9, OPD meet and confer with OPOA and other involved
27 parties as necessary. Commencing the week of April 16, OPD to make any and all revisions to the
28 matrix and MOR as necessary based on the meet and confer process with OPOA and other concerned

parties. OPD to consult with Chief Tucker regarding his final approval of the revised matrix and MOR. Complete any necessary meet and confer meetings with all parties. Obtain final approval by Chief Tucker of the matrix and report to the Court the final status of the matrix and MOR by April 30, 2007.

Based on the progress accomplished to date, and the schedule set forth above, the City respectfully requests that the Court allow more time to complete the meet and confer process on the discipline matrix, either by continuing the March 30 deadline to April 30 or, in the alternative, referring the matter to Judge Larson for s settlement conference to be scheduled after May 1, 2007.

Respectfully submitted:

Dated: March 28, 2007

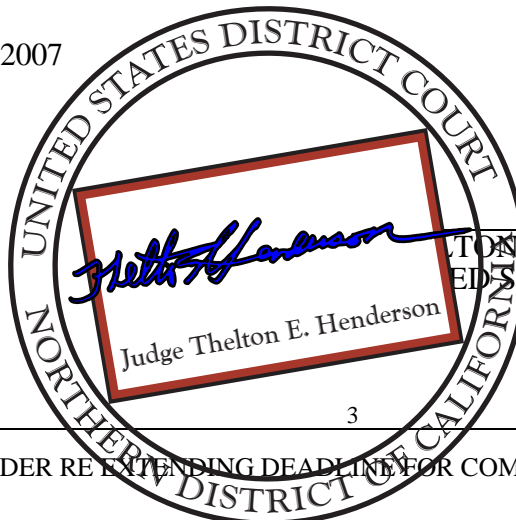
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By: /s/
GREGORY M. FOX

ORDER

Good cause appearing, the deadline for completing the meet and confer process between the parties on the discipline matrix is continued to April 30, 2007. If by that date the parties are unable to reach agreement on any and all issues regarding the discipline matrix then, on April 30, 2007, the parties are to inform the Court of the current status and request an immediate referral of any outstanding issues to Judge Larson for settlement conference.

Dated: 04/02 , 2007



Thelton E. HENDERSON, JUDGE
UNITED STATES DISTRICT COURT